VALERO

Benicia Refinery • Valero Refining Company - California
3400 East Second Street • Benicia, California 94510-1097 • Telephone (707) 745-7011 • Facsimile (707) 745-7432

February 24, 2016

2015 Annual Export Report
Valero Refining Company – CA
Benicia Refinery, CAD 063001770

Office of Enforcement and Compliance Assurance
Office of Federal Activities
International Compliance Assurance Division (2254A)
Environmental Protection Agency
1200 Pennsylvania Avenue
Washington, DC 20460

Statewide Compliance Division
Hazardous Waste Management Program
Department of Toxic Substances Control
Post Office Box 806
Sacramento, CA 95812-0806

Dear Sir or Madam:

Pursuant to 40 CFR 262.56, 262.87 and California Title 22 CCR 66262.56, Valero hereby submits this annual export notification report for hazardous wastes shipped from the Valero Benicia Refinery to facilities out of the United States in 2015.

Generator of Exported Waste:

EPA ID # CAD 063001770
Valero Refining Company – California
3400 East Second Street
Benicia, California 94510

Calendar Year Covered by Report: 2015

Name and Site Address of Each Consignee:

EG Metal Corporation
687, Cheoyong-Ro, NamGu
Ulsan 680-160, South Korea

A total of 610,871 pounds of spent hydrotreating catalyst (K171) was exported from the Valero Benicia Refinery in April and May, 2015 to the EG Metal Corporation facility in South Korea for metals reclamation. The transporter of this material from the Benicia Refinery to the Port of

received
SDH Mar 8 2016

Oakland was Ponder Environmental (CAR000180737). The OECD waste code is B1120. The DOT shipping name for this spent catalyst is:

UN3190, Waste, self-heating solid, inorganic, N.O.S. (Spent Hydrotreating Catalyst), 4.2, PG III, (K171)RQ

Waste Minimization Efforts:

Catalysts used in refinery processes are selected to maximize the efficiency of the catalyst and to minimize the amount of waste catalyst that is generated. Catalysts that have a longer service life are used when practicable. Where feasible, regenerated catalysts are used which minimizes the amount of catalyst that must be disposed of in a landfill. Valero routinely monitors developing catalyst technologies for opportunities to reduce the amount s of catalyst required or to increase the service life of the material. Where economically practical, spent catalyst is shipped to a metals reclamation facility where valuable metals are recovered.

Major refinery maintenance turnarounds occur approximately every four to five years and provide an opportunity to remove certain wastes such as spent catalysts and sludge from processing units. Some catalysts are also generated during mid-cycle minor turnarounds that occur more frequently. Due to the episodic nature of catalyst generation, there is a high degree of variability from year to year making it difficult to compare annual waste volumes to identify meaningful trends.

Certification of Primary Exporter:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine or imprisonment."

02/22/2016
Date

Christopher W. Howe
Christopher W. Howe, Director
EHS & Community/Government Affairs

If you have any questions or need further information, please contact me at 707-745-7660.

Regards,

John A. Lazorik
Senior Staff Environmental Engineer

JAL/tac

Document # 25037

2

V9264.indd N/S 2/10

VALERO
BENICIA REFINERY
3400 East Second Street • Benicia, California 94510-1005

S22123.107

MAR 07 2019

FCF2019714

3 of 3

VALERO
BENICIA REFINERY
3400 East Second Street • Benicia, California 94510-1097

Office of Enforcement & Compliance Assurance
Office of Federal Activities
Int'l Compliance Assurance Div. (2254A)
Environmental Protection Agency
1200 Pensylvania Avenue
Washington, DC 20460

V0407.PMD NS 6/2002